

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

D-1 DR. RAJENDRA BOTHRA,

Defendant.

Case No. 18-cr-20800

Honorable Stephen J. Murphy

**DEFENDANT’S MOTION FOR LEAVE TO FILE REPLY IN
EXCESS OF SEVEN PAGES**

Defendant Rajendra Bothra, through undersigned counsel, seeks permission to exceed the seven-page limit for its anticipated reply to the government’s response to Defendant Bothra’s Emergency Motion for Revocation of Detention Order and Pretrial Release. In support of this motion, Defendant states the following:

1. Local Rule 7.1(d)(3)(b) states, “The text of a reply brief, including footnotes and signatures, may not exceed 7 pages.”
2. The implications of the matter before the Court are numerous and complex.
3. Defendant has tried to condense his reply into the allocated seven pages; however, in order to adequately address all legal arguments, Defendant requires an additional 13 pages.

4. The government defers to the discretion of the Court in Defendant's request.
5. Accordingly, Defendant respectfully requests leave to file a 20-page reply responding to the government's response to Defendant Bothra's Emergency Motion for Revocation of Detention Order and Pretrial Release.

WHEREFORE, Defendant respectfully requests the entry of an order granting this motion for leave to file a reply in excess of the page limit.

Dated: August 15, 2019

Respectfully Submitted,

PRASAD LEGAL, PLLC

By: /s/ Anjali Prasad
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CERTIFICATE OF SERVICE

I hereby certify that on August 15, 2019, I electronically filed the foregoing document with the Clerk of the Court using the ECF system, which will send notification of such filing to all registered counsel.

Respectfully submitted,

/s/ Anjali Prasad

Anjali Prasad (P75771)

Attorney for Defendant